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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Document Related to:

DIRECT PURCHASER ACTIONS

**DECLARATION OF CATHLEEN H.  
HARTGE IN SUPPORT OF DEFENDANT  
LG ELECTRONICS, INC.'S  
ADMINISTRATIVE MOTION TO SEAL  
IN SUPPORT OF REPLY IN SUPPORT  
OF MOTION FOR PARTIAL SUMMARY  
JUDGMENT ON WITHDRAWAL  
GROUND**

[Administrative Motion to Seal and [Proposed]  
Order filed concurrently herewith]

Judge: Honorable Samuel Conti

Date: February 6, 2015

Time: 10:00am

Crtrm.: 1, 17<sup>th</sup> Floor

3:07-md-05944-sc; MDL 1917

**DECLARATION OF CATHLEEN H. HARTGE IN SUPPORT OF DEFENDANT LG ELECTRONICS, INC.'S  
ADMINISTRATIVE MOTION TO SEAL IN SUPPORT OF REPLY IN SUPPORT OF MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON WITHDRAWAL GROUND**

1 I, Cathleen H. Hartge, hereby declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of  
3 record for Defendant LG Electronics, Inc. ("LGE"), in the above entitled action. I am licensed  
4 in the State of California and admitted to practice before this Court. I make this declaration  
5 based on my personal knowledge and, if called upon as a witness, could and would testify  
6 competently as to the matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of  
8 the LGE's Administrative Motion to Seal.

9 3. LGE seeks permission to file under seal the highlighted portions of the sealed  
10 version of its Reply in Support of its Motion for Partial Summary Judgment on Withdrawal  
11 Grounds.

12 4. The portions of the document referenced in Paragraph 3 contain discussion,  
13 analysis, references to, or information taken directly from, material designated by Defendants  
14 Chunghwa and Philips in this matter as "CONFIDENTIAL" under the Stipulated Protective  
15 Order (Dkt. No. 306) in this case.

16 5. LGE further seeks permission to file under seal the following documents in their  
17 entirety:

18 (a) Exhibit A of the Declaration of Cathleen H. Hartge in Support of LGE's  
19 Reply in Support of its Motion for Partial Summary Judgment on Withdrawal Grounds ("Hartge  
20 Declaration");

21 (b) Exhibit C of the Hartge Declaration.

22 6. The document referenced in paragraph 5(a) has been designated  
23 "CONFIDENTIAL" by Chunghwa under the Stipulated Protective Order (Dkt. No. 306).

24 7. The document referenced in paragraph 5(b) is an excerpt of the transcript of a  
25 Philips witness designated "CONFIDENTIAL" by Philips under the Stipulated Protective Order  
26 (Dkt. No. 306).

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